



Luisa L. Lancetti
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January 4, 2002

Via Electronic Mail Delivery

Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, D.C. 20554

**Re: Ex Parte Presentation – Hatfield Inquiry
CC Docket No. 94-102**

Dear Ms. Salas:

Attached for filing is a copy of a letter Sprint PCS sent to Thomas Sugrue, Chief, Wireless Telecommunications Bureau, on this date regarding wireless E911 implementation and the recently-announced Hatfield inquiry into technical and operational issues affecting deployment of wireless enhanced 911 services.

Pursuant to Section 1.1206(a), an original and one copy of this letter are being filed with your office. Please associate this letter with the files in the above-captioned proceeding.

Please contact us if you have questions regarding this submission.

Sincerely,

A handwritten signature in black ink, appearing to be "L. Lancetti", with a long horizontal flourish extending to the right.

Luisa L. Lancetti

Attachment



Luisa L. Lancetti
Vice President
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By Electronic Mail Delivery

Thomas J. Sugrue, Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Wireless E911 Implementation/Hatfield Inquiry,
FCC Docket No. 94-102**

Dear Mr. Sugrue:

Sprint PCS was pleased to hear of the Commission's decision to appoint Dale Hatfield to lead an inquiry into wireless E911 deployment.¹ With his broad knowledge and experience, Mr. Hatfield is well-suited for this important job. As detailed in Sprint PCS' filings in this docket, there are a number of issues that will effect the timing and efficacy of E911 deployment. To assist in this important effort, Sprint PCS lists below (in order of priority) issues that it believes Mr. Hatfield should examine.

1. LEC ALI Database Upgrades. Operational E911 systems require three distinct components, but the FCC has addressed only two of them: carrier readiness (in the *Phase II Waiver Orders*), and PSAP readiness (in the *Richardson Order*). The FCC has yet to address the third indispensable component: readiness of the E911 network, which principally involves Phase II upgrades to Automatic Location Information (ALI) databases. There is growing evidence that many E911 network operators (principally, incumbent LECs) have no plans to make ALI database upgrades in the near future. Because there is no E911 service without these upgrades, Sprint PCS respectfully urges Mr. Hatfield to give priority to this matter. In this regard, Mr. Hatfield should request LECs to provide a report of their Phase II implementation plans and require the LECs to identify any obstacles to Phase II deployment.

2. Standardized Carrier-E911 Network Interfaces. The FCC has recognized that it is "necessary that some common interface standard be employed by the carrier and the PSAP," but it declined to adopt the industry J-STD-036 standard, because of concern that

¹ See Public Notice, "FCC Announces Dale Hatfield to Lead Inquiry of Technical and Operational Issues Affecting Deployment of Wireless Enhanced 911 Services" (Nov. 20, 2001).

it should not "dictate technical standards" for Phase II implementation.² Sprint PCS fears that the FCC may have misunderstood what the industry standard requires, as Sprint PCS explained in its November 30, 2001 Reconsideration Petition. However, regardless of whether the industry standard is adopted, some common interface standard is necessary if Phase II E911 systems are to be implemented rapidly. As the Commission has recognized, a PSAP will be unable to receive and utilize Phase II data if it has not upgraded its ALI database to be able to pull data from the wireless carriers at the appropriate time. A standardized interface will assist both the PSAP and the wireless carriers in rapid implementation.

3. Prioritizing Pending Phase II PSAP Requests. Sprint PCS has received, to date, over 168 Phase II requests representing 930 individual PSAPS and, under its *Phase II Waiver Order*, it is required to convert by the end of next year all of these PSAPs plus all additional requests it receives by June 30, 2002. Converting this many PSAPs in this short time frame will be challenging. The public interest is served by maximizing the number of PSAPs that are activated, and this goal is best achieved by ensuring that finite carrier resources are used efficiently and productively. Some rational means must be found to prioritize requests (e.g., focusing on PSAPs demonstrating that their ALI databases will be timely upgraded).

4. Coordinating PSAP Phase II Requests. In many areas, four, five or even six different wireless carriers provide services in a PSAP's service area. A PSAP with little experience in Phase II technology is often overwhelmed with attempting to convert so many carriers at one time. PSAPs would often be well served by installing Phase II service with one carrier, and once its system is operational and tested, expanding the installation to other carriers. The key to making such an approach work is to find an equitable means to allocate different carriers with different PSAPs. We hope Mr. Hatfield is able to assist in this arena.

5. Carrier Phase II Readiness. Sprint PCS submits that this issue is becoming moot as a practical matter. For example, Sprint PCS expects that its entire nationwide network will be Phase II capable by August 2002, some eight months from now. However, vendors continue to struggle with software and hardware production and any assistance Mr. Hatfield can provide in encouraging the timely availability of necessary network components would be appreciated.

6. Handset Availability. This issue is also becoming moot as a practical matter. As handset manufacturers convert to new chipsets over the course of 2002, handset availability should be less of an issue. For instance, Sprint PCS alone hopes to sell five million Phase II handsets by the end of next year. To the extent Mr. Hatfield can ensure that handset manufacturers do not attempt to artificially inflate the cost of GPS enabled hand-

² *Richardson Order*, Docket No. 94-102, FCC 01-293, at n.31 and ¶ 31 (Oct. 17, 2001).

sets and thus slow their adoption, such intervention would assist the rapid conversion to Phase II systems.

7. Phase II Accuracy. Some carriers, but not Sprint PCS, have obtained temporary waivers of the Phase II accuracy requirements. Accuracy is very important, but Sprint PCS submits that Mr. Hatfield's immediate attention is best spent by focusing on ensuring that the procedures for implementing and activating E911 systems work well. Accuracy issues can be addressed once there is confidence that Phase II implementation is proceeding smoothly.

Sprint PCS looks forward to working with Mr. Hatfield, and it stands ready to assist him in undertaking this important task.

Sincerely,



Luisa L. Lancetti

cc: Dale N. Hatfield
James Schlichting
Kris Monteith
Tom Navin
Bryan Tramont
Paul Margie
Monica Desai
Peter Tenhula
Robert M. Gurss
James R. Hobson